

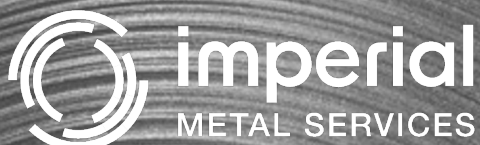
FORCED LABOUR IN CANADIAN SUPPLY CHAINS

2025 Report

Imperial Metal Services

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Forced Labour in the Canadian Supply Chains - 2025 Report

Introduction

In May 2023, the Parliament of Canada passed Bill S-211, the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “Act”). The Act came into effect on January 1, 2024, and requires certain entities and government institutions to report annually on the actions they have taken during the previous financial year to prevent and reduce the risk of forced labour or child labour occurring within their operations or supply chains.

The purpose of this report is to outline Imperial Metal Services’ (“IMS” or the “Corporation” or “company” or “organization” or “our” or “we”) approach to minimizing the risk that forced labour or child labour is used at any step of our Canadian production or in our supply chains.

This report refers to the 2025 fiscal year and has been prepared by the Corporation in compliance with the Act.

Steps to prevent and reduce risks of forced labour and child labour

IMS’s success must be governed by a strong commitment to the highest standards of respect and integrity in all our internal and external business relationships and activities. We recognize human rights as an essential corporate responsibility and a value guiding our activities. Therefore, we expect our business partners to do the same.

IMS has taken the following steps during 2025 to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada by the Corporation or of goods imported into Canada by the Corporation.

INTERNAL AND EXTERNAL ASSESSMENTS

IMS conducts internal and external assessments of forced labour and child labour risks in the organization's activities and supply chains. Along with inquiring about financial stability, legal compliance, quality management, capacity constraints, and reputation, we assess safe work practices and ethical and social responsibilities, including forced labour and child labour. This is mainly done when searching for new suppliers or when operational or activity changes have occurred at existing suppliers.

INFORMATION ON WORKER RECRUITMENT

Our human resources department gathers information on worker recruitment and maintains internal controls to ensure all workers are recruited legally and voluntarily.

AUDITING SUPPLIERS

In 2025, our procurement department has equally directed and administered random site visits at several new and existing suppliers in Canada and worldwide. The audits included assessments regarding health and safety, working conditions, compliance with environmental regulations, and other relevant supplier information. It also included auditing compliance with child labour regulations and general labour protection regulations, including forced labour.

IMS conducts business with many long-standing, reputable global trading companies that deal with multiple sites and ensure assessments and audits are conducted regularly.

TRAINING AND AWARENESS

IMS has developed and implemented training and awareness material on forced labour and child labour. This formal awareness training is mandatory for employees who make contracting or purchasing decisions, as well as for senior management and executive-level employees.

Structure, activities, and supply chains

STRUCTURE

Imperial Metal Services (IMS) is a leading processor and distributor of flat steel products and is a member of Imperial Manufacturing Group (IMG). Created in 2024 through the amalgamation of two long-standing, reputable steel service centres, Pointe-Claire Steel and Norbel Metal Services, our head office is located in Etobicoke, Ontario. We are incorporated under the *Canada Business Corporation Act* and have reporting obligations under the Act.

ACTIVITIES

The company offers multi-blanking, levelling, cut-to-length, slitting, and edging services. We process the following carbon steel products in a variety of thicknesses and widths from our Etobicoke, Ontario, facility, as well as our two other facilities located in Pointe-Claire and Dorval, Quebec:

- Hot-rolled
- Cold-rolled
- Galvanized
- Galvannealed

We also offer a diverse range of steel and aluminum products, including prepainted steel, aluminized steel, galvalume, tin mill products, electrogalvanized steel, and aluminum.

SUPPLY CHAINS

IMS's global supply chains include businesses that supply goods and services to our organization, primarily materials used in the production of products we manufacture, sell, and distribute to our customers. IMS imports raw materials, both directly and indirectly, from premium suppliers worldwide. Many of these suppliers have long-standing, strong relationships with IMS. Most goods purchased are sourced from North America, Europe, and Asia and consist mostly of flat-rolled steel.

Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour

IMS is committed to and has embedded responsible business conduct into our policies and management systems. Our Code of Business Conduct requires us to respect human rights in all our business activities, both internal and external. We expect all employees, as well as our business partners, to act accordingly.

The Code of Business Conduct recognizes human rights and the fact that it is governed by law. We have an obligation to comply with all applicable laws and regulations governing our business conduct worldwide. IMS operates in respect to the *Canadian Human Rights Act*.

Our Corporate Core Values include topics such as Teamwork, Work Ethic, and Integrity, which, in turn, support our commitment to upholding human rights. Respect, honesty, trust, and doing what's right are expected from all IMS team members. These values and belief fundamentals guide our behaviours and are reflected in our day-to-day operations.

IMS applies responsible purchasing and ethical practices in our supply chains and will work to formalize policies regarding Supplier Codes of Conduct and Compliance Standards, including references prohibiting forced labour and child labour. We continue to consult international and industry-leading standards to develop robust policies and procedures. We aim to uphold the rights of customers, employees, and workers across our supply chains.

Assessing Our Risk

Supply chain risk management encompasses assessing, analyzing, and evaluating all types of risks associated with outsourcing goods and services. Risks can be identified as financial, operational, legal, environmental, social, and ethical, including risks of forced and child labour.

Importing raw materials, no matter the sector or industry, cannot be presumed to be completely free of forced labour and child labour risks. Considering some of IMS's supply chains are in the manufacturing industry and involve regions that are known to have participated in forced and/or child labour, it is important that we conduct risk assessments before and while engaging with suppliers.

Some of the steps taken by IMS to identify forced labour and child labour risks include researching the Global Modern Slavery Index data and child labour data for risk by country, sector, and/or industry. We also conduct supplier factory audits. Fortunately, we have not identified any instances of forced or child labour in our current supply chains.

Remediation

MEASURES TO REMEDIATE FORCED LABOUR OR CHILD LABOUR

To date, IMS has not identified any instances of forced or child labour in our activities or supply chains. Therefore, no measures to remediate forced labour or child labour have been taken.

MEASURES TO REMEDIATE THE LOSS OF INCOME TO VULNERABLE FAMILIES

As we have not identified any instances of forced or child labour in our activities or supply chains, no measures have been taken in this area.

Training

The Corporation's Code of Business Conduct, presented to employees during onboarding, includes a detailed description of our position on human rights, indicates the requirement to comply with all applicable laws and regulations governing our business conduct worldwide, and establishes reporting responsibilities when policy violations are observed and identified.

IMS has developed and implemented training and awareness materials on forced labour and child labour. Formal mandatory awareness training has and will continue to be provided to employees who make contracting and purchasing decisions, as well as to senior management and executive-level employees.

Measuring Our Effectiveness

While IMS has some measures in place and is building more robust processes, no action has been taken to assess our effectiveness in preventing and reducing the risks of forced labour and child labour in our activities and supply chains.

Approval and Attestation

This report was approved by IMS's governing body.

In accordance with the requirements of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act), and in particular section 11 thereof, I, in the capacity of President, attest that I have reviewed the information contained in the report on behalf of the governing body of the entity listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed within this report.

Omer Babineau

Omer Babineau

President

Imperial Metal Services

May 25, 2026

I have the authority to bind Imperial Metal Services.